

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 22cr10027
)	
v.)	Violation:
)	
KAREN SILVA-BROWN,)	<u>Count One:</u> Theft of Government Money
)	(18 U.S.C. § 641)
)	
Defendant)	<u>Forfeiture Allegation:</u>
)	(18 U.S.C. § 981(a)(1)(C) and
)	28 U.S.C. § 2461)

INDICTMENT

COUNT ONE

Theft of Government Money
(18 U.S.C. § 641)

The Grand Jury charges:

From in or about November 2014 through in or about October 2018, in the District of
Massachusetts, the defendant,

KAREN SILVA-BROWN,

did, on a recurring basis, knowingly and willfully embezzle, steal, purloin, and convert to her use
and the use of another, any money and thing of value of the United States and of any department
and agency thereof, in a total amount greater than \$1,000, namely, approximately \$60,810 in Social
Security benefits paid for the benefit of her child, K.P.C.

All in violation of Title 18, United States Code, Section 641.

FORFEITURE ALLEGATION
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 641, set forth in Count One, the defendant,

KAREN SILVA-BROWN,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following asset:

a. \$60,810, to be entered in the form of a forfeiture money judgment.



2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL


FOREPERSON
KAREN B. BURZYCKI
SPECIAL ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: FEBRUARY 2, 2022
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK